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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUZZANNE MICHAELS

Plaintiff,

v.

KILOLO KIJAKAZI,
Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01262-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion to Reverse and Remand (Dkt. No. 24, filed on December 1, 2022), currently due on January 3, 2023, by 30 days, through and including February 2, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 19) be extended accordingly.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Counsel is currently in the process of determining whether a settlement agreement is possible in this case and needs additional time to continue settlement negotiations. If the case cannot be settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's

1 Motion to Reverse and Remand by the new due date of February 2, 2023. Counsel for Defendant
2 advised counsel for Plaintiff of the need for this extension on January 3, 2023. Counsel for Plaintiff
3 confirmed that Plaintiff does not object to this request.

4 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
5 Motion to Reverse and Remand, through and including February 2, 2023. This request is made in
6 good faith and with no intention to unduly delay the proceedings.

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8 Dated: January 3, 2023

Respectfully submitted,

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ David Priddy
12 DAVID PRIDDY
13 Special Assistant United States Attorney

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15 IT IS SO ORDERED.

16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: January 4, 2023
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

Dated: January 3, 2023

/s/ David Priddy
DAVID PRIDDY
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